

1 G. EDWARD RUDLOFF, JR. (State Bar No. 56058)
2 DIANNE J. MECONIS (State Bar No. 120895)
3 **RUDLOFF WOOD & BARROWS LLP**
4 2000 Powell Street, Suite 900
5 Emeryville, CA 94608
Telephone: (510) 740-1500
Facsimile: (510) 740-1501
E-mail: erudloff@rwblaw.com
dmeconis@rwblaw.com

6 Attorneys for Defendant THE TRAVELERS
7 INDEMNITY COMPANY

8
9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 AFFILIATED ENGINEERS W, INC.

No. C 06-04865-JW

14 Plaintiff,

15 vs.

16 THE TRAVELERS INDEMNITY
17 COMPANY,

Defendant.

18
19
20 **STIPULATION FOR
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE;
[PROPOSED] ORDER THEREON**
[Local Rule 6-2, 7-12]

Complaint filed: August 11, 2006
Trial Date: None Set

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
2000 POWELL STREET, SUITE 900
EMERYVILLE, CALIFORNIA 94608
(510) 740-1500

21 WHEREAS, Plaintiff Affiliated Engineers W., Inc. ("Plaintiff") filed a Motion for
Summary Adjudication on the duty to defend in this matter on September 15, 2006; and

22 WHEREAS, the hearing on Plaintiff's motion was held on November 6, 2006, and
the matter was taken under submission; and

23 WHEREAS, the parties herein, through their counsel of record, have met and
conferred regarding case management; and

24 WHEREAS, the parties agree that many of the case management issues, such as the
extent of and timing of discovery and the length of and time for trial, are dependent on the
outcome of Plaintiff's Motion for Summary Adjudication; and

1 WHEREAS, the current case management conference is scheduled for November
2 20, 2006, and the parties' joint case management conference statement is due on or before
3 November 10, 2006; and

4 WHEREAS, the parties believe that they can more intelligently address the issues in
5 the joint case management statement, if the statement is submitted after the ruling on
6 Plaintiff's Motion For Summary Adjudication; and

7 WHEREAS, there have been no prior continuances of the case management
8 conference; and

WHEREAS, the parties believe that a continuance of the case management conference will not significantly affect the timing of the final resolution of this case;

NOW THEREFORE, it is stipulated that the foregoing facts are true and correct and that the case management conference, which is currently scheduled for November 20, 2006, should be continued to January 8, 2007 at 10:00 a.m. or to such other date and time as the Court shall order, and that the joint case management conference statement shall be due ten days before the case management conference.

DATED: November 7, 2006

NIELSEN, HALEY & ABBOTT LLP

~~By:~~

James C. Nielsen

Attorneys for Plaintiff AFFILIATED
ENGINEERS W, INC.

DATED: November 1, 2006

RUDLOFF WOOD & BARROWS LLP

By:

G. Edward Rudloff Jr.

Attorneys for Defendant THE TRAVELERS
INDEMNITY COMPANY

1 [PROPOSED] ORDER
2
3
4
5

Pursuant to stipulation, it is hereby ordered that the case management conference in
the above captioned action, which is currently set for November 20, 2006 at 10:00 a.m. is
continued to January 8, 2007 at 10:00 a.m.

6 IT IS SO ORDERED.
7
8 DATED: 11/08/2007
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


UNITED STATES DISTRICT JUDGE

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
2000 POWELL STREET, SUITE 900
EMERYVILLE, CALIFORNIA 94608
(510) 740-1500

1 **PROOF OF SERVICE BY MAIL AND ELECTRONIC SUBMISSION**

2 I, Barbara Parker, hereby declare:

3 I am over the age of eighteen and not a party to the within cause. I am employed in
4 the County of Alameda, California, in the office of a member of the bar of the court in
5 which the within action is pending at whose direction the following service was made. My
6 business address is Rudloff Wood & Barrows LLP, 2000 Powell Street, Suite 900,
7 Emeryville, California 94608.

8 I am personally and readily familiar with the business practice of Rudloff Wood &
9 Barrows LLP for the collection and processing of correspondence for mailing with the
10 United States Postal Service, pursuant to which mail placed for collection at designated
11 stations in the ordinary course of business is deposited the same day, proper postage
12 prepaid, with the United States Postal Service.

13 I am also personally and readily familiar with the business practice of Rudloff
14 Wood & Barrows LLP for electronic service of documents.

15 On November 7, 2006, I served the within: **STIPULATION FOR**
16 **CONTINUANCE OF CASE MANAGEMENT CONFERENCE; [PROPOSED]**
17 **ORDER THEREON [Local Rule 6-2, 7-12]** on the parties named below in this action by
18 (1) submitting via electronic submission and (2) placing a true copy thereof enclosed in a
19 sealed envelope for collection and mailing on this date, following ordinary business
20 practices, addressed as follows:

21 James C. Nielsen , Esq.
22 Nielsen, Haley & Abbott LLP
23 44 Montgomery St., Suite 750
24 San Francisco, CA 94104
25 Tel.: 415 693 0900
26 Fax: 415 693 9674
27 E-mail: jnielsen@nielsenhaley.com

28 I declare under penalty of perjury under the laws of the State of California that the
29 foregoing is true and correct, and that this declaration was executed on November 7, 2006,
30 at Emeryville, California.


Barbara Parker